

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
John Leone	:	Chapter 13
	:	Case No.: 19-16260-AMC
Debtor	:	

MOTION TO REOPEN AND VACATE THE ORDER GRANTING DISMISSAL

John Leone (the “Debtor”), by and through the undersigned counsel, respectfully request this Honorable Court to Reopen their Chapter 13 Case and Vacate the Order Granting the Dismissal of their Chapter 13 Case, and in support thereof respectfully state the following:

1. The Debtor filed a Chapter 13 Bankruptcy on October 3, 2019 (the “Petition Date”).
2. On the Petition Date, the Debtor filed a chapter 13 plan which provided for, among other things, pro rata distribution to unsecured creditors.
3. The Standing Chapter 13 Trustee filed a Motion to Dismiss the Debtors case for the Failure to make Plan Payments on November 8, 2022.
4. The Debtor’s Chapter 13 Case was dismissed on April 05, 2023.
5. The Debtor intends to make a lump sum payment to cure the arrears to the chapter 13 trustee on or before the hearing date for this Motion, and thereafter remain current in chapter 13 plan payments.
6. The Debtor is aware that he must remain current with the Chapter 13 Trustee in order to avoid any future attempts to Modify the Automatic Stay or Motions filed by the Trustee to dismiss the case.

WHEREFORE, the Debtors respectfully request that this Court reopen the Chapter 13 Bankruptcy and vacate the Order granting Dismissal.

Dated: May 3, 2023

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